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MEMO ENDORSED

March 4, 2022

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re: Flores v. The National Football League, et al.; Case No. 22 Civ. 00871 (VEC)

Dear Judge Caproni:

We represent Plaintiff Brian Flores and write jointly with Defendants National Football League, New York Football Giants, Inc., Miami Dolphins, Ltd. and Denver Broncos (together "Defendants") to respectfully request an adjournment of the Rule 16(b) conference currently scheduled for March 18, 2022 to April 29, 2022 or such other date thereafter convenient for the Court. If acceptable to the Court, the parties propose to adjourn the pre-conference deadline to submit a joint letter and case management plan currently scheduled for March 10, 2022 to April 21, 2022 or 10 days before the Rule 16(b) conference. This is the first request for an extension of these deadlines.

The parties respectfully request this adjournment because Plaintiff has informed Defendants that he expects to file an Amended Complaint before the current deadline to respond, April 11, 2022, and the parties agree it would be a better use of resources for the parties to confer pursuant to Rule 26(f) and appear before the Court after the Amended Complaint is filed and after Defendants have had an opportunity to review the amended allegations and claims. Defendants also have requested, and Plaintiff has consented to, a 45-day period to respond to the Amended Complaint from the date of service, subject to the Court's approval.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "DH Wigdor".

Douglas H. Wigdor

Application GRANTED.

The initial pretrial conference, currently scheduled for Friday, March 18, 2022 at 3:00 P.M., is adjourned to **Friday, April 29, 2022 at 11:00 A.M.** Pre-conference submissions are due no later than **Thursday, April 21, 2022.** For a description of the pre-conference submission requirements, the parties should consult the Court's Order at docket entry 13. The Court will decide whether to hold the conference in person or by teleconference once the Court has reviewed the parties' pre-conference submissions.

Any amended complaint is due no later than **Friday, April 8, 2022.** After an amended complaint has been served on Defendants or they waive such service, the parties may file a joint stipulation for the Court's approval with a proposed deadline for Defendants to answer, move, or otherwise respond to the Amended Complaint.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

Date: March 4, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE